# Exhibit H

## UNITED STATES DISTRICT COURT
## FOR THE SOUTHERN DISTRICT OF OHIO
## EASTERN DIVISION

**STACIE RAY, et al.**

       Plaintiffs,

v.

**STEPHANIE MCCLOUD, Director,**
**Ohio Department Health, et al.,**

       Defendants.

Case No.: 2:18-cv-00272-MHW-CMV

Judge: Michael Watson
Magistrate Judge: Chelsey Vascura

## DECLARATION OF JOHN A. KNIGHT
Pursuant to 28 U.S.C. 1746

I, John A. Knight, declare under penalty of perjury that the following is true and correct
to the best of my knowledge and belief:

1.      I am above the age of 18, I am competent to testify, and I have personal
knowledge of the matters contained in this declaration.

2.      I am a Senior Staff Attorney at the American Civil Liberties Union ("ACLU")
Foundation's national LGBT Project and I represent Plaintiffs in this litigation. The ACLU
Foundation is the legal and educational arm of the national organization, the American Civil
Liberties Union.

3.      The ACLU is a national non-profit organization that relies upon the contributions
of its members and supporters, and in part upon attorney fees incurred in litigation, to fund its
operations.

4.      I am licensed to practice law in Illinois and I have been since 1989.

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5.      I am also admitted in the Northern, Central and Southern Districts of Illinois, the Western and Eastern Districts of Wisconsin, the Western and Eastern Districts of Michigan, the Sixth and Seventh Circuits, and the United States Supreme Court. I am admitted pro hac vice in the United States District Court for the Southern District of Ohio as counsel in this case.

6.      I have been with the ACLU since March 2004. Prior to that, I was employed as a trial attorney by the Equal Employment Opportunity Commission from 2000 to 2004. From 1995 until 2000, I was a clinical lecturer at the Edwin F. Mandel Legal Aid Clinic of the University of Chicago, where I supervised law students working on cases for persons who were homeless or at imminent risk of becoming homeless and co-taught a course on LGBT rights. I worked as an associate at the Chicago law firm of Rothschild, Barry & Myers from 1990 until 1995. Before that, I worked for two years as a law clerk for Judge Hubert L. Will of the United States District Court for the Northern District of Illinois.

7.      Since 1995, I have developed litigation specialties in the areas of civil rights and civil liberties law. I have accumulated experience working on complex constitutional and other federal civil rights litigation similar to the work I performed in this lawsuit. For example, I have been lead counsel in cases involving restrictions on transgender persons changing their sex designation on identification documents in Illinois, Alaska, and Michigan.

8.      My resume detailing my professional qualifications is attached to this Declaration as Exhibit H-1.

9.      My hours expended working on this case are attached to this Declaration as Exhibit H-2.

10.      The time expended and costs incurred have been reasonable, and the records submitted are an accurate reflection of the time I expended in this case. I documented my time in

six-minute increments.

11. I exercised billing judgment in preparing these time records.

12. The reasonable hourly rate for my work is $500.

13. I am using a fair market rate for a senior attorney with subject matter expertise in the geographic region where this case was litigated. My normal rate for this type of litigation is $525 and is based on the rates of civil rights attorneys in the Chicago area. The $500 rate we are using for my time is reduced to be comparable to local attorneys, and based in part on the guidance published by the Ohio State Bar Association, attached to the Fee Petition in this case as Exhibit A.

14. The lodestar figure for my work on this case, determined by multiplying my reasonable hours expended by my reasonable rate, is 12*500 = **$6,000**.

Dated: February 1, 2021

By: /s/ John A. Knight
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